THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

DANIEL D'AMBLY,

Plaintiffs,

VS.

CHRISTIAN EXOO a/k/a @ANTIFASH GORDON; ST. LAWRENCE UNIVERSITY; TRIBUNE PUBLISHING COMPANY, LLC; NEW YORK DAILY NEWS; VIJAYA GADDE; TWITTER, INC; COHEN, WEISS AND SIMON, LLP; UNNAMED ASSOCIATES 1 – 100,

Defendants.

TO: Lauren James-Weir, Esq.

GIBBONS P.C.

One Gateway Center

Newark, New Jersey 07102 Telephone: 973-596-4861

Email: ljames-weir@gibbonslaw.com

Attorneys for Defendants Vijaya Gadde and Twitter, Inc.

Monica C. Barrett, Esq.

BOND, SCHOENECK & KING, PLLC

600 Third Avenue, 22nd Floor

New York, NY 10009

Telephone: 646-253-23014 Email: mbarrett@bsk.com

Attorneys for Defendant St. Lawrence University

Richard Scharlat, Esq.

MCDERMOTT WILL & EMERY, LLP

340 Madison Avenue

New York, NY 10173

Telephone: 212-547-5421

Email: Rscharlat@mwe.com

Attorneys for Defendants Tribune Publishing Company and New York Daily News

Michael J. Canning, Esq.

GIORDANO, HALLERAN & CIESLA, P.C.

CIVIL ACTION NO.: 2:20-cv-12880-JMV-JAD

(Filed Electronically)

NOTICE OF MOTION FOR AN ORDER GRANTING LEAVE TO FILE A FIRST AMENDED COMPLAINT 125 Half Mile Road, Suite 300 Red Bank, NJ 07701-6777 Telephone: 732-741-3900

Email: mcanning@ghclaw.com

Attorneys for Defendants Cohen, Weiss and Simon, LLP

Christopher Marlborough, Esq. THE MARLBOROUGH LAW FIRM, P.C. 445 Broad Hollow Road, Suite 400 Melville, NY 11747

Telephone: 212-991-8960

Email: chris@marlboroughlawfirm.com Attorney for Defendant Christian Exoo

PLEASE TAKE NOTICE that on January 11, 2021, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned shall apply to the United States District Court, District of New Jersey, located at 50 Walnut Street, Newark, New Jersey, for an Order pursuant to Fed. R. Civ. 15 and Fed. R. Civ. P. 20, and Local Civ. R. 15.1 granting Plaintiff DANIEL D'AMBLY Leave to file a First Amended Complaint.

PLEASE TAKE FURTHER NOTICE that in support of the motion, Plaintiff will rely upon the enclosed Certification of Patrick Trainor, Esq., Brief in Support, First Amended Complaint, and form of the amended complaint that indicates in what respect it differs from the original Complaint.

PLEASE TAKE FURTHER NOTICE that a Proposed Order is attached.

Dated: January 10, 2021

Patrick Trainor, Esquire (Attorney ID 242682019) LAW OFFICE OF PATRICK TRAINOR, ESO., LLC

848 Paterson Avenue

East Rutherford, New Jersey 07073

P: (201) 777-3327 F: (201) 896-7815 pt@ptesq.com

Attorney for Plaintiffs